



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 15, 2021

BY ECF

Honorable P. Kevin Castel
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

**Re: *United States v. Geovanny Fuentes-Ramirez,*
S6 15 Cr. 379 (PKC)**

Dear Judge Castel:

The Government respectfully submits this letter with respect to the Court's proposed jury instructions. With respect to venue, there is currently no stipulation between the parties (p. 59). The Government proposes the following instruction with respect to venue:

Congress has determined that certain acts begun or committed outside the territorial jurisdiction of the United States are chargeable under U.S. law. This applies to Counts One through Three of the Indictment. Thus, the Government need not prove that the crime was committed in this District or that the defendant himself was present here. Instead, it is enough if you find that the point of entry where any co-conspirator of the defendant was first brought into the United States was in the Southern District of New York. Thus, for example, if you determine that one of the defendant's co-conspirators was first brought into the United States within the Southern District of New York in connection with the co-conspirator's arrest, venue would be appropriate in the Southern District of New York as to the defendant.

The Government has no other comments to the Court's proposed charge at this time.

Respectfully submitted,

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United States Attorney

by: _____/s/
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cc: Defense counsel of record (by ECF)